IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	U.S. DISTRICT COURT EASTERN DISTRICT OF TEXAS	8
	§	No. 1:16-CR-14	
v.	§	FEB 1 8 2016	
	§	· - 25.5	
PARKER RYAN LITTLE	§		
		BY	
		DEPUTY	

FILED

FACTUAL BASIS AND STIPULATION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the United States of America, by and through the undersigned Assistant United States Attorney in and for the Eastern District of Texas, joined by Parker Ryan Little, defendant, and counsel of record, John McElroy, and presents this factual basis and stipulation in support of the defendant's plea of guilty to Counts One and Two of the information, and, in support thereof, would show the following:

- 1. That **Parker Ryan Little**, defendant, hereby stipulates and agrees to the truth of all matters set forth in this factual basis and stipulation, and agrees that such admission may be used by the Court in support of his plea of guilty to Counts One and Two of the information, alleging a violation of 18 U.S.C. § 844(e), Making a False Bomb Threat.
- 2. That the defendant, **Parker Ryan Little**, who is pleading guilty to Counts One and Two of the information, is one and the same person charged therein.

- 3. That the events described in Counts One and Two of the information occurred in the Eastern District of Texas and elsewhere.
- 4. That had this matter proceeded to trial, the Government, through the testimony of witnesses and through admissible exhibits, would have proven, beyond a reasonable doubt, each and every essential element of the offense alleged in Counts One and Two of the information; specifically, the Government would have proven the following stipulated facts:
 - a. On April 11, 2015, at approximately 4:09 p.m., an emergency call was placed stating that a person identifying himself as "M.S." just shot his mother, strapped a bomb to his 21 year old daughter's chest and was armed with an AR-15, and provided an address on Saba Lane in Port Neches, TX. The call was placed from (847) 665-9027, which was later determined to be a telephone number associated with Google Voice. Google Voice is a so-called "telephony" service that makes telephone calls via the Internet. Due to the nature of the emergency call, the Jefferson County SWAT Team was called out to the scene. After approximately two and a half hours, SWAT team members made contact with the occupant of the residence, at which time he exited the residence and was handcuffed. No other occupants were located inside the residence and no evidence of the reported incident was found. The occupant of the home on Saba Lane, identified as J.L., was determined to have no knowledge of or involvement in the incident.
 - b. On the same night, the Corinth Police Department received a similar call at approximately 2017 hours. Corinth Police Officers were dispatched to a home on Terra Evergreen, Shady Shores, TX, which is located in Denton County. Denton

County dispatch advised they had received a call from a male stating he had shot his mother, strapped a bomb to his sister and was in possession of a knife and a rifle. The call was placed from (847) 665-9027, the same Google Voice number used to make the emergency call in Port Neches. Due to the nature of the call, the Denton bomb squad, Denton County Sherriff's Department SWAT, and the Texas Rangers also responded to the scene. Eventually, two male occupants and one female occupant exited the residence and were handcuffed outside. No evidence of the reported incident was found inside the residence. The occupants, identified as Mr. J.V., Mrs. J.V., and K.W. were determined to have no involvement in the incident. The V's daughter, S.V., arrived on scene after the residence was cleared. S.V., a professional Call of Duty video game competitor, told officers that a computer hacker named "Demon" had been contacting her and that "Demon" harassed her family, posted her and her family's personal information on line and attempted to hack into her online play via Skype. S.V. told officers she was contacted by "Demon" earlier in the evening. She said he was angry and threatened to hack her PayPal account and Twitter. S.V. believed the "swatting" 1 was his way of trying to humiliate her while she was streaming live playing video games.

c. On April 13, 2015, H.S. contacted the Port Neches Police Department and advised that believed she had information relating to the incident on Saba Lane.
 H.S. said the address on Saba Lane where the bomb threat was made on April 11th

^{1 &}quot;Swatting" involves the placing of a hoax call to 9-1-1 (usually reporting a serious crime, such as a hostage situation or active shooter) in order to draw a response from law enforcement, usually the SWAT team. Swatting has become prevalent among gamers, targeting those who "livestream" or broadcast themselves and their game play live over the Internet.

was her previous residence and that she recently moved to another address with her family. H.S., a professional Twitch Live Streamer, told investigators that she and her family had been threatened via Twitter and phone calls for the past few months and identified the person threatening her by his Twitter user name, "@DeMonTheLord". H.S. said she had received a message from "@DeMonTheLord" on Saturday, April 11, at approximately 5:08 p.m., asking her "did the police call?" and telling her he heard she had been "swatted".

- d. Through a number of subpoenas and search warrants, investigators were able to determine that the e-mail address used to initiate the Google Voice account using phone number (847) 665-9027, loljonthedemon@gmail.com, and Twitter account @DeMonTheLord were both owned by the defendant, Parker Little. Investigators were also able to determine via IP addresses that both accounts were accessed from Little's address in Wagoner, OK, as well as his grandparent's address, where he sometimes visited.
- e. By reviewing Little's emails, Twitter direct messages ("DM"s), and by contacting other telephone numbers called from (847) 665-9027, investigators were able to determine that he harassed others on Twitter, using the @DeMoNTheLord account. Little would primarily harass well known online gamers, some of whom had millions of Twitter followers, and attempt coerce them into following him on Twitter or mentioning @DeMoNTheLord in a positive light, presumably to gain more Twitter followers and increase his own stature. If they would not comply with his demands, he would seek revenge on them in

various ways, including "swatting", "doxing"², or hacking and taking over their Twitter account. The investigation identified at least 7 other victims of Parker's online harassment, some of whom were "swatted" in a manner similar to the victims listed in Counts One and Two of the information.

DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

5. I have read this factual basis and stipulation and the information or have had them read to me and have discussed them with my attorney. I fully understand the contents of this factual basis and stipulation and agree without reservation that it accurately describes the events and my acts.

Dated: 1-29-16

PARKER RYAN LITTLE
Defendant

DEFENSE COUNSEL'S SIGNATURE AND ACKNOWLEDGMENT

7. I have read this factual basis and stipulation and the information and have reviewed them with my client, Parker Ryan Little. Based upon my discussions with the defendant, I am satisfied that the defendant understands the factual basis and stipulation as well as the information, and is knowingly and voluntarily agreeing to these stipulated facts.

² Doxing (from dox, abbreviation of documents), or doxxing, is the Internet-based practice of researching and broadcasting personally identifiable information about an individual.

Dated: 1-29-2016

John D. MELLOY

JOHN MCELROY

Attorney for the Defendant

Respectfully submitted,

JOHN M. BALES

UNITED STATES ATTORNEY

Dated: 22.16

CHRISTOPHER T. TORTORICE ASSISTANT U.S. ATTORNEY